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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS LETTER BRIEF IN
SUPPORT OF ITS MOTION TO
COMPEL FORENSIC IMAGES AND
OTHER MATERIALS PROVIDED BY
THE DILIGENCED EMPLOYEES TO
STROZ FRIEDBERG**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal its Letter Brief in Support of its Motion to Compel forensic images and other materials provided by the Diligenced Employees to Stroz Friedberg (“Letter Brief”). Specifically, Waymo requests an order granting leave to file under seal the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief	Highlighted in Blue	Defendants
Exhibits 1-3	Entire Documents	Defendants and Third Parties Bismuth, Sandstone, and Levandowski

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. DEFENDANTS’ AND/OR THIRD PARTIES’ CONFIDENTIAL INFORMATION

Waymo seeks to seal the Letter Brief as identified in the table above, because Waymo believes it also contains information considered confidential or non-public by Defendants or by certain third parties. (Schmidt Decl. ¶ 4.) Waymo expects Defendants or third parties to file declarations in accordance with the Local Rules. (*Id.*)

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1 **III. CONCLUSION**

2 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the
3 above listed documents accompany this Administrative Motion. For the foregoing reasons,
4 Waymo respectfully requests that the Court grant Waymo's administrative motion to file under
5 seal.

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7 DATED: September 24, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

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9 By /s/ Charles Verhoeven

Charles Verhoeven
Attorneys for WAYMO LLC